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RICHARD GAYER
526 West Wilshire Drive
Phoenix, AZ 85003
(602) 229-8954
rgayer@cox.net

Arizona Corporation Commission

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Docket Control Office
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, AZ 85007

ARIZONA CORPORATION COMMISSION
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Re: Docket No. G-01551A-13-0327; Decision No. 74780
Objections to SWGas' Proposed Tariff Revisions

ORIGINAL

Complainant Richard Gayer hereby objects to several of the proposed tariff revisions submitted by Southwest Gas Corporation (SWGas).

Objections to the Revised Tariff

1. SWGas has deleted the Monthly Weather Adjustment and substituted a confusing "EEP Weather Adjustment", in clear violation of the text of the Order in Decision No. 74780. The Decision expressly defines the "MWA" (Decision at page 3 line 3), repeats "MWA" numerous times, and specifically orders a line item for the "MWA charge" which does not permit changing its name. SWGas' improper use of "EEP" confuses the "MWA charge" with the "EEP charge". (Decision at page 7 line 27.)

2. There is no definition of the actual months to which the MWA applies; that is, there is no statement that the applicable monthly bills are those that *cover* the "winter months", not necessarily those dated from November through April. (SWGas appears to indicate the "covered" month by the right-most bar in the graphical display of past usage.)

3. There is no direction to the sources of the actual Heating Degree Days (HDDs) used by SWGas. According to SWGas, the sources are GHCND:USW00023160 for Tucson and GHCND:USW00023183 for Phoenix.

4. There is no information about the data points to use for the regression analysis. According to SWGas, the data points are from the last eight bills that *cover* December, January, February and March (not necessarily the dates of the bills) starting with the most recent bill, and that the actual HDD data are for those same eight months.

Compare the detailed information about the rather simple formula used in the "Billing Cycle Analysis" that occupies almost one full page (parts of pages 92 and 93) with the mere six lines devoted to the more complex regression analysis on page 93. (Apparently, a regression analysis is not applied to bills that *cover* the outlier months of November and April.)

5. There is no information about which data are used in the regression analysis for the "X" values and which are used for the "Y" values. According to SWGas, the "X" values are the actual HDDs for a given month and the "Y" values are the total therms used during that month (so that the coefficient's units are therms per HDD).

6. Regarding the total therms used in performing the regression analysis, there is no statement that the "base usage" is *not* subtracted from that total (as it is for the MWA calculation).

7. Tariff page 97 is blank as being "held for future use" and is therefore available for the additional information required by the Order, as set forth above.

The foregoing items must be included in the revised tariff in order to comply with the Order in Decision No. 74780. Thank you for considering these objections.

Respectfully submitted by,


RICHARD GAYER, Complainant

Hard copies and e-mail copies of this document were mailed to the following persons:

Jason Wilcock
Southwest Gas Corporation
5241 Spring Mountain Road
Las Vegas, Nevada 89150
(jason.wilcock@swgas.com)

Robert Gray
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007
(bgray@azcc.gov)

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